



Fw: WER Confirmation Tests Memo

Powell,
William Beckwith to: James E 12/07/2010 05:48 PM
(DEC)
Dan Graham, "McGee, William
Cc: D (DEC)", "Diamond, Jerry",
"Rimelman, Ronald"
Bcc: Charles Stephan

Jim - Sending this to summarize my thoughts from the conversation we just had concerning the attached Tetra Tech memo dated 12/1/10. That memo was sent to us by Dan Graham of PacRim Coal by email of 12/6/10 and concerns the metals mixture test that PacRim/Tetra Tech intends to conduct to evaluate if the individual proposed Chuitna site-specific metals criteria for Cu, Pb, Zn, and Al are protective in combination. It addresses the approach that Tetra Tech used to estimate the total metals concentrations necessary to ensure that the mixture contains dissolved metal at the proposed dissolved acute site-specific criteria concentration for each individual metal.

- To my knowledge we have not seen the total metals data from the individual WER test. That data should be reviewed as part of the review of the metals mixture test, and considered before any conclusions are drawn on the results of the metals mixture test or any proposal to calculate total recoverable WERs and total recoverable site-specific criteria (note that Dan's subsequent email, also of 12/6/10, indicated that the site water sample would be collected today for testing this week).

- As noted in my 11/19/10 email, TSS and stream flow should be added to the measurements to be conducted on the site water sample that were listed in Tetra Tech's 11/18/10 memo (page 3) concerning the metals mixture testing.

- As ADEC and EPA have suggested previously, PacRim should consider including a series of mixed metal concentrations/treatments in the test design, with treatments below and possibly above the proposed target mixture. This could be useful in the event that the proposed target mixture is toxic and might help ensure that the targeted dissolved concentrations are achieved.

Since my time around the office is limited, I am copying Dan and Tetra Tech now.

- Bill
206-553-2495

----- Forwarded by William Beckwith/R10/USEPA/US on 12/07/2010 04:40 PM

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Date: 12/06/2010 10:46 AM

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Bill, Pete and Jim –

Attached is a memo from Tetra Tech to me explaining the final test procedure to be used for the WER confirmation tests. In our last discussion, Bill had some questions regarding total to dissolved ratio. This information is contained herein.

Please take a moment to review this document. If you have any question or comments regarding the final test, please get those to us by the close of business tomorrow.

Thanks! Hope you all had a good weekend.

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